IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA NORTHERN DIVISION

NO. 2:10-CR-8-FL

UNITED STATES OF AMERICA)	
V.)	
)	
GARY JACKSON,)	JOINT MOTION TO
WILLIAM WHEELER MATHEWS, JR.,)	FILE JOINTLY-REVIEWED
ANDREW HOWELL,)	PROPOSED PROTECTIVE
RONALD SLEZAK,)	ORDER BY JUNE 25, 2010
ANA BUNDY,)	
)	
Defendants.)	

The United States, by and through the United States Attorney for the Eastern District of North Carolina, hereby files this motion, with the defendants joining, to allow the parties to file a jointly-reviewed protective order by June 25, 2010.

The United States has prepared a draft protective order and that draft order has been reviewed by the Court Security Officer. Counsel for the defendants have received a copy of this draft order and are continuing to review it amongst themselves. The parties seek a one-week extension of the deadline to submit a jointly-reviewed protective order so that the parties can continue to work together on this issue and resolve as much disagreement between the parties as possible regarding the content of this order. This plan would help to minimize, or even possibly eliminate, litigation on this issue.

Further, because sensitive and/or classified discovery will not be produced for some time under the adopted scheduling order, this plan will cause no delay in the discovery production schedule.

Respectfully submitted this 18th day of June, 2010.

GEORGE HOLDING
United States Attorney

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CERTIFICATE OF SERVICE

This is to certify that I have this 18th day of June, 2010, served a copy of the foregoing upon counsel for the defendants in this action by electronically filing the foregoing with the Clerk of Court, using the CM/ECF system which will send notification of such filing to:

Defendant Jackson:

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